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Flightcraft GROUP OF COMPANIESDEPT. OF TRANSPORTATION
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U.S. Department of Transportation Dockets
Docket No. F.A.A. -1999 - 5401 - 27
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ORIGINAL

Subject: Aging Airplane Safety - Proposed Rule
Docket No. FAA - 1999 - 5401; Notice No. 99 - 02
Rin 2120 - AE42

Response by: **Convair®** Division
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To whom it may concern:

Before making comments regarding Docket No. FAA - 1999 - 5401; Notice No. 99 - 02 Rin 2120 - AE42 I would like to introduce Kelowna Flightcraft Ltd. as being the new owners of the **Convair®** Division.

Flightcraft purchased the company from the **Tracor** company in November of 1998 and are in the process of transferring the Type Certificate.

Kelowna Flightcraft have operated and maintained Convair aircraft for the past 20 years. The company has the ability and approvals to overhaul aircraft, develop **STC's** and with the purchase of the **Convair®** Division will be manufacturing Convair parts for the support of the Convair aircraft.

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The company has via an STC developed the CV5800 (stretched CV580) in conjunction with Convair General Dynamics and Allison in the early 90's. The STC held is both FAA and Transport Canada Approved.

Note: The CV5800 by the way, although registered as either 340 / 440 is considered by work carried out as equal to a new aircraft and should not in any way be included in the standard 340 / 440 category.

WE also developed a Convair cargo door, again, in conjunction with Convair General Dynamics and have installed twelve to date.

As you can see we have been quite involved with the Convair industry and have been active with Convair, Allison, F.A.A. and Transport Canada in the Supplemental Inspection Document, Corrosion Document etc. of the aging aircraft program.

WE feel that as the largest operator of CV580's, and having vast experience with the Convair aircraft that there are other options available rather than abruptly ending the life of an aircraft that has had one of the best safety records in aviation history.

We recognize that the Convair aircraft was not truly designed to "damage tolerance" but, rather a multiple load path design which in it's own has produced an aircraft that has an impeccable service history for over 45 years.

Damage tolerance analysis is difficult without exposure data, however the outstanding service history and with the implementation of the Supplemental and Corrosion Inspection programs along with present day part 121 inspection programs the aircraft is being well looked at.

In the **extreme end** of maintaining the total safety of the aircraft we can recognize and visualize the replacement of critical areas of the aircraft and from service history project the threshold for these parts as replacement components.

To further emphasize this philosophy , Flightcraft's CV5800 in design now carries a new stainless steel keel beam in the fuselage, heavier designed wing to fuselage attach fittings, heavier main landing gear attach fittings etc. These parts are all available via Flightcraft and installable as a component element.

Stabilizer attach fittings for example are available new and could be classified as a replaceable part at a prescribed time.

Service history of these critical area's will provide the criteria needed to develop a program of inspections and possible component replacements.

Summary:

Our company in conjunction with Convair operators with quality maintenance programs feel that this proposed rule is too severe and that **all** other avenues should be approached before implementation.

Yours truly,



Bill De Meester
Manager;
Convair® Division